November 30, 1988; Case Nos. U_9004, U_9006, U_9007 (Consolidated); Industry Framework for IntraLATA Toll Competition; Rebuttal Testimony on Behalf of MCI.
June 30, 1989; Case No. U-8987; Michigan Bell Telephone Company Incentive Regulation Plan; Direct Testimony on Behalf of MCI.

July 31, 1992; Case No. U-10138; MCI v Michigan Bell and GTE re IntraLATA Equal Access; Direct Testimony on Behalf of MCI.

November 17, 1992; Case No. U-10138; MCI v Michigan Bell and GTE re IntraLATA Equal Access; Rebuttal Testimony on Behalf of MCI.

July 22, 1993; Case No. U-10138 (Reopener); MCI v Michigan Bell and GTE re IntraLATA Equal Access; Direct Testimony on Behalf of MCI.

February 16, 2000; Case No. U-12321; AT&T Communications of Michigan, Inc. Complainant v. GTE North Inc. and Contel of the South, Inc., d/b/a GTE Systems of Michigan; Direct Testimony on Behalf of AT&T. (Adopted Testimony of Michael Starkey)

May 11, 2000; Case No. U-12321; AT&T Communications of Michigan, Inc. Complainant v. GTE North Inc. and Contel of the South, Inc., d/b/a GTE Systems of Michigan; Rebuttal Testimony on Behalf of AT&T.

Minnesota:

January 30, 1987; Docket No. P_421/CI_86_88; Summary Investigation into Alternative Methods for Recovery of Non_traffic Sensitive Costs; Comments to the Commission on Behalf of MCI.

September 7, 1993; Docket No. P-999/CI-85-582, P-999/CI-87-697 and P-999/CI-87-695, In the Matter of an Investigation into IntraLATA Equal Access and Presubscription; Comments of MCI on the Report of the Equal Access and Presubscription Study Committee on Behalf of MCI.

September 20, 1996; Petition for Arbitration with U S WEST Communications, Inc.; Docket No. P-442, 421/M-96-855; P-5321, 421/M-96-909; and P-3167, 421/M-96-729 (consolidated); Direct Testimony on Behalf of MCI.

September 30, 1996; Petition for Arbitration with U S WEST Communications, Inc.; Docket No. P-442, 421/M-96-855; P-5321, 421/M-96-909; and P-3167, 421/M-96-729 (consolidated); Rebuttal Testimony on Behalf of MCI.

September 14-16, 1999; USWC OSS Workshop; Comments on Behalf of MCI WorldCom, Inc. re OSS Issues.

September 28, 1999; Docket No. P-999/R-97-609; Universal Service Group; Comments on Behalf of MCI WorldCom, Inc. and AT&T Communications.

Montana:

May 1, 1987; Docket No. 86.12.67; Rate Case of AT&T Communications of the Mountain States, Inc.; Direct Testimony on Behalf of MCI.

September 12, 1988; Docket No. 88.1.2; Rate Case of Mountain States Telephone and Telegraph Company; Direct Testimony on Behalf of MCI.

May 12, 1998; Docket No. D97.10.191; Application of WorldCom, Inc. for Approval to Transfer Control of MCI Communications Corporation to WorldCom, Inc.; Rebuttal Testimony on Behalf of MCI.

June 1, 1998; Docket No. D97.10.191; Application of WorldCom, Inc. for Approval to Transfer Control of MCI Communications Corporation to WorldCom, Inc.; Amended Rebuttal Testimony on Behalf of MCI.

Nebraska:

November 6, 1986; Application No. C_627; Nebraska Telephone Association Access Charge Proceeding; Direct Testimony on Behalf of MCI.

March 31, 1988; Application No. C_749; Application of United Telephone Long Distance Company of the Midwest for a Certificate of Public Convenience and Necessity; Direct Testimony on Behalf of MCI.

New Hampshire:

April 30, 1993; Docket DE 93-003; Investigation into New England Telephone's Proposal to Implement Seven Digit Dialing for Intrastate Toll Calls; Direct Testimony on Behalf of MCI.

New Jersey:

September 15, 1993; Docket No. TX93060259; Notice of Pre-Proposal re IntraLATA Competition; Comments in Response to the Board of Regulatory Commissioners on Behalf of MCI.

October 1, 1993; Docket No. TX93060259; Notice of Pre-Proposal re IntraLATA Competition; Reply Comments in Response to the Board of Regulatory Commissioners on Behalf of MCI.

April 7, 1994; Docket Nos. TX90050349, TE92111047, and TE93060211; Petitions of MCI, Sprint and AT&T for Authorization of IntraLATA Competition and Elimination of Compensation; Direct Testimony on Behalf of MCI.

April 25, 1994; Docket Nos. TX90050349, TE92111047, and TE93060211; Petitions of MCI, Sprint and AT&T for Authorization of IntraLATA Competition and Elimination of Compensation; Rebuttal Testimony on Behalf of MCI.

New Mexico:

September 28, 1987; Docket No. 87_61_TC; Application of MCI for a Certificate of Public Convenience and Necessity; Direct Testimony on Behalf of MCI.

August 30, 1996: Docket No. 95-572-TC; Petition of AT&T for IntraLATA Equal Access; Rebuttal Testimony on Behalf of MCI.

New York:

April 30, 1992; Case 28425; Comments of MCI Telecommunications Corporation on IntraLATA Presubscription.

June 8, 1992; Case 28425; Reply Comments of MCI Telecommunications Corporation on IntraLATA Presubscription.

North Dakota:

June 24, 1991; Case No. PU-2320-90-183 (Implementation of SB 2320 -- Subsidy Investigation); Direct Testimony on Behalf of MCI.

October 24, 1991; Case No. PU-2320-90-183 (Implementation of SB 2320 -- Subsidy Investigation); Rebuttal Testimony on Behalf of MCI.

Oklahoma:

April 2, 1992; Cause No. 28713; Application of MCI for Additional CCN Authority to Provide IntraLATA Services; Direct Testimony on Behalf of MCI.

June 22, 1992; Cause No. 28713; Application of MCI for Additional CCN Authority to Provide IntraLATA Services; Rebuttal Testimony on Behalf of MCI.

Oregon:

October 27, 1983; Docket No. UT 9; Pacific Northwest Bell Telephone Company Business Measured Service; Direct Testimony on Behalf of the Public Utility Commissioner of Oregon.

April 23, 1984; Docket No. UT 17; Pacific Northwest Bell Telephone Company Business Measured Service; Direct Testimony on Behalf of the Public Utility Commissioner of Oregon.

May 7, 1984; Docket No. UT 17; Pacific Northwest Bell Telephone Company Business Measured Service; Rebuttal Testimony on Behalf of the Public Utility Commissioner of Oregon.

October 31, 1986; Docket No. AR 154; Administrative Rules Relating to the Universal Service Protection Plan; Rebuttal Testimony on Behalf of MCI.

September 6, 1996; Docket ARB3/ARB6; Petition of MCI for Arbitration with U S WEST Communications, Inc.; Direct Testimony on Behalf of MCI.
October 11, 1996; Docket No. ARB 9; Interconnection Contract Negotiations Between MCImetro and GTE; Direct Testimony on Behalf of MCI.

November 5, 1996; Docket No. ARB 9; Interconnection Contract Negotiations Between MCImetro and GTE; Rebuttal Testimony on Behalf of MCI.

Pennsylvania:

December 9, 1994; Docket No. I-00940034; Investigation Into IntraLATA Interconnection Arrangements (Presubscription); Direct Testimony on Behalf of MCI.

Rhode Island:

April 30, 1993; Docket No. 2089; Dialing Pattern Proposal Made by the New England Telephone Company; Direct Testimony on Behalf of MCI.

South Dakota:

November 11, 1987; Docket No. F_3652_12; Application of Northwestern Bell Telephone Company to Introduce Its Contract Toll Plan; Direct Testimony on Behalf of MCI.

Utah:

November 16, 1987; Case No. 87_049_05; Petition of the Mountain State Telephone and Telegraph Company for Exemption from Regulation of Various Transport Services; Direct Testimony on Behalf of MCI.

July 7, 1988; Case No. 83_999_11; Investigation of Access Charges for Intrastate InterLATA and IntraLATA Telephone Services; Direct Testimony on Behalf of MCI.

November 8, 1996; Docket No. 96-095-01; MCImetro Petition for Arbitration with USWC Pursuant to 47 U.S.C. Section 252; Direct Testimony on Behalf of MCI.

November 22, 1996; Docket No. 96-095-01; MCImetro Petition for Arbitration with USWC Pursuant to 47 U.S.C. Section 252; Rebuttal Testimony on Behalf of MCI.

September 3, 1997; Docket No. 97-049-08; USWC Rate Case; Surrebuttal Testimony on Behalf of MCI.

September 29, 1997; Docket No. 97-049-08; USWC Rate Case; Revised Direct Testimony on Behalf of MCI.

Washington:

September 27, 1988; Docket No. U_88_2052_P; Petition of Pacific Northwest Bell Telephone Company for Classification of Services as Competitive; Direct Testimony on Behalf of MCI.

October 11, 1996; Docket No. UT-960338; Petition of MCImetro for Arbitration with GTE Northwest, Inc., Pursuant to 47 U.S.C.252; Direct Testimony on Behalf of MCI.

November 20, 1996; Docket No. UT-960338; Petition of MCImetro for Arbitration with GTE Northwest, Inc., Pursuant to 47 U.S.C.252; Rebuttal Testimony on Behalf of MCI.

January 13, 1998; Docket No. UT-970325; Rulemaking Workshop re Access Charge Reform and the Cost of Universal Service; Comments and Presentation on Behalf of MCI.

West Virginia:

October 11, 1994; Case No. 94-0725-T-PC; Bell Atlantic - West Virginia Incentive Regulation Plan; Direct Testimony on Behalf of MCI.

June 18, 1998; Case No. 97-1338-T-PC; Petition of WorldCom, Inc. for Approval to Transfer Control of MCI Communications Corporation to WorldCom, Inc.; Rebuttal Testimony on Behalf of MCI.

Wisconsin:

October 31, 1988; Docket No. 05_TR_102; Investigation of Intrastate Access Costs, Settlements, and IntraLATA Access Charges; Direct Testimony on Behalf of MCI.

November 14, 1988; Docket No. 05_TR_102; Investigation of Intrastate Access Costs, Settlements, and IntraLATA Access Charges; Rebuttal Testimony on Behalf of MCI.

December 12, 1988; Docket No. 05_TI_116; In the Matter of Provision of Operator Services; Rebuttal Testimony on Behalf of MCI.

March 6, 1989; Docket No. 6720_TI_102; Review of Financial Data Filed by Wisconsin Bell, Inc.; Direct Testimony on Behalf of MCI.

May 1, 1989; Docket No. 05_NC_100; Amendment of MCI's CCN for Authority to Provide IntraLATA Dedicated Access Services; Direct Testimony on Behalf of MCI.

May 11, 1989; Docket No. 6720_TR_103; Investigation Into the Financial Data and Regulation of Wisconsin Bell, Inc.; Rebuttal Testimony on Behalf of MCI.

July 5, 1989; Docket No. 05-TI-112; Disconnection of Local and Toll Services for Nonpayment -- Part A; Direct Testimony on Behalf of MCI.

July 5, 1989; Docket No. 05-TI-112; Examination of Industry Wide Billing and Collection Practices -- Part B; Direct Testimony on Behalf of MCI.

July 12, 1989; Docket No. 05-TI-112; Rebuttal Testimony in Parts A and B on Behalf of MCI.

October 9, 1989; Docket No. 6720-TI-102; Review of the WBI Rate Moratorium; Direct Testimony on Behalf of MCI.

November 17, 1989; Docket No. 6720-TI-102; Review of the WBI Rate Moratorium; Rebuttal Testimony on Behalf of MCI.

December 1, 1989; Docket No. 05-TR-102; Investigation of Intrastate Access Costs, Settlements, and IntraLATA Access Charges; Direct Testimony on Behalf of MCI.

April 16, 1990; Docket No. 6720-TR-104; Wisconsin Bell Rate Case; Direct Testimony of Behalf of MCI.

October 1, 1990; Docket No. 2180-TR-102; GTE Rate Case and Request for Alternative Regulatory Plan; Direct Testimony on Behalf of MCI.

October 15, 1990; Docket No. 2180-TR-102; GTE Rate Case and Request for Alternative Regulatory Plan; Rebuttal Testimony on Behalf of MCI.

November 15, 1990; Docket No. 05-TR-103; Investigation of Intrastate Access Costs and Intrastate Access Charges; Direct Testimony on Behalf of MCI.

April 3, 1992; Docket No. 05-NC-102; Petition of MCI for IntraLATA 10XXX 1+ Authority; Direct Testimony on Behalf of MCI.

Wyoming:

June 17, 1987; Docket No. 9746 Sub 1; Application of MCI for a Certificate of Public Convenience and Necessity; Direct Testimony on Behalf of MCI.

May 19, 1997; Docket No. 72000-TC-97-99; In the Matter of Compliance with Federal Regulations of Payphones; Oral Testimony on Behalf of MCI.

Comments Submitted to the Federal Communications Commission and/or the Department of Justice

March 6, 1991; Ameritech Transmittal No. 518; Petition to Suspend and Investigate on Behalf of MCI re Proposed Rates for OPTINET 64 Kbps Service.

April 17, 1991; Ameritech Transmittal No. 526; Petition to Suspend and Investigate on Behalf of MCI re Proposed Flexible ANI Service.

August 30, 1991; Ameritech Transmittal No. 555; Petition to Suspend and Investigate on Behalf of MCI re Ameritech Directory Search Service.

September 30, 1991; Ameritech Transmittal No. 562; Petition to Suspend and Investigate on Behalf of MCI re Proposed Rates and Possible MFJ Violations Associated with Ameritech's OPTINET Reconfiguration Service (AORS).

October 15, 1991; CC Docket No. 91-215; Opposition to Direct Cases of Ameritech and United (Ameritech Transmittal No. 518; United Transmittal No. 273) on Behalf of MCI re the introduction of 64 Kbps Special Access Service.

November 27, 1991; Ameritech Transmittal No. 578; Petition to Suspend and Investigate on Behalf of MCI re Ameritech Directory Search Service.

September 4, 1992; Ameritech Transmittal No. 650; Petition to Suspend and Investigate on Behalf of MCI re Ameritech 64 Clear Channel Capability Service.

February 16, 1995; Presentation to FCC Staff on the Status of Intrastate Competition on Behalf of MCI.

November 9, 1999; Comments to FCC Staff of Common Carrier Bureau on the Status of OSS Testing in Arizona on Behalf of MCI WorldCom, Inc.

November 9, 1999; Comments to the Department of Justice (Task Force on Telecommunications) on the Status of OSS Testing in Arizona and the USWC Collaborative on Behalf of MCI WorldCom, Inc.

Presentations Before Legislative Bodies:

April 8, 1987; Minnesota; Senate File 677; Proposed Deregulation Legislation; Comments before the House Committee on Telecommunications.

October 30, 1989; Michigan; Presentation Before the Michigan House and Senate Staff Working Group on Telecommunications; "A First Look at Nebraska, Incentive Rates and Price Caps," Comments on Behalf of MCI.
May 16, 1990; Wisconsin; Comments Before the Wisconsin Assembly Utilities Committee Regarding the Wisconsin Bell Plan for Flexible Regulation, on Behalf of MCI.

March 20, 1991; Michigan; Presentation to the Michigan Senate Technology and Energy Committee re SB 124 on behalf of MCI.

May 15, 1991; Michigan; Presentation to the Michigan Senate Technology and Energy Commission and the House Public Utilities Committee re MCI's Building Blocks Proposal and SB 124/HB 4343.

March 8, 2000; Illinois; Presentation to the Environment & Energy Senate Committee re Emerging Technologies and Their Impact on Public Policy, on Behalf of MCI WorldCom, Inc.

Presentations Before Industry Groups -- Seminars:

May 17, 1989; Wisconsin Public Utility Institute -- Telecommunications Utilities and Regulation; May 15-18, 1989; Panel Presentation -- Interexchange Service Pricing Practices Under Price Cap Regulation; Comments on Behalf of MCI.

July 24, 1989; National Association of Regulatory Utility Commissioners -- Summer Committee Meeting, San Francisco, California. Panel Presentation -- Specific IntraLATA Market Concerns of Interexchange Carriers; Comments on Behalf of MCI.

May 16, 1990; Wisconsin Public Utility Institute -- Telecommunications Utilities and Regulation; May 14-18, 1990; Presentation on Alternative Forms of Regulation.

October 29, 1990; Illinois Telecommunications Sunset Review Forum; Two Panel Presentations: Discussion of the Illinois Commerce Commission's Decision in Docket No. 88-0091 for the Technology Working Group; and, Discussion of the Treatment of Competitive Services for the Rate of Return Regulation Working Group; Comments on Behalf of MCI.

May 16, 1991; Wisconsin Public Utility Institute -- Telecommunications Utilities and Regulation Course; May 13-16, 1991; Participated in IntraLATA Toll Competition Debate on Behalf of MCI.

November 19, 1991; TeleStrategies Conference -- "Local Exchange Competition: The $70 Billion Opportunity." Presentation as part of a panel on "IntraLATA 1+ Presubscription" on Behalf of MCI.

July 9, 1992; North Dakota Association of Telephone Cooperatives Summer Conference, July 8-10, 1992. Panel presentations on "Equal Access in North Dakota: Implementation of PSC Mandate" and "Open Network Access in North Dakota" on Behalf of MCI.

December 2-3, 1992; TeleStrategies Conference -- "IntraLATA Toll Competition -- A Multi-Billion Dollar Market Opportunity." Presentations on the interexchange carriers' position on intraLATA dialing parity and presubscription and on technical considerations on behalf of MCI.

March 14-17, 1993; NARUC Introductory Regulatory Training Program; Panel Presentation on Competition in Telecommunications on Behalf of MCI.

May 13-14, 1993; TeleStrategies Conference -- "IntraLATA Toll Competition -- Gaining the Competitive Edge"; Presentation on Carriers and IntraLATA Toll Competition on Behalf of MCI.

May 23-26, 1994; The 12th Annual National Telecommunications Forecasting Conference; Represented IXCs in Special Town Meeting Segment Regarding the Convergence of CATV and Telecommunications and other Local Competition Issues.

March 14-15, 1995; "The LEC-IXC Conference"; Sponsored by Telecommunications Reports and Telco Competition Report; Panel on Redefining the IntraLATA Service Market -- Toll Competition, Extended Area Calling and Local Resale.

August 28-30, 1995; "Phone+ Supershow '95"; Playing Fair: An Update on IntraLATA Equal Access; Panel Presentation.

August 29, 1995; "TDS Annual Regulatory Meeting"; Panel Presentation on Local Competition Issues.

December 13-14, 1995; "NECA/Century Access Conference"; Panel Presentation on Local Exchange Competition.

October 23, 1997; "Interpreting the FCC Rules of 1997"; The Annenberg School for Communication at the University of Southern California; Panel Presentation on Universal Service and Access Reform.

TJG SCHEDULE 2

AMERITECH ISP SERVICE OFFERING DOCUMENTS

Illinois Commerce Commission
Docket 00-0332
Level 3 Data Request 69

Request:

Please explain what is meant by the statement in Attachment 1 that reads, "you can establish a remote Point of Presence without investing in costly network equipment, real estate and leased lines back to the hub location."

Response:

OmniPresence allows customers to provide local numbers to end user customers in the markets of their choice by providing Centrex service terminating in the Ameritech Illinois central office. Callers are then forwarded to the customer's Hub using Ameritech Illinois' network. Without Omnipresence, a customer would be required to rent space and place equipment in order to terminate leased lines to multiple physical locations.

Illinois Commerce Commission
Docket 00-0332
Level 3 Data Request 70

Request:

Please explain what is meant by the statement in Attachment 1 that read, "OmniPresence lets you break into new markets and offer your customers a local call."

Response:

Ameritech Illinois states that OmniPresence makes a local calling area available to a customer's end users.

Illinois Commerce Commission
Docket 00-0332
Level 3 Data Request 71

Request:

Please admit that the description of ENSEMBLE provided in Attachment 2 to this First Set of Data Request is accurate. If you do not so admit, please explain in detail your reasons for not so admitting, and state all facts and produce all documents that support those reasons.

Response:

Ameritech Illinois admits that the description of Ensemble as provided in Attachment 2 is accurate.

Illinois Commerce Commission
Docket 00-0332
Level 3 Data Request 72

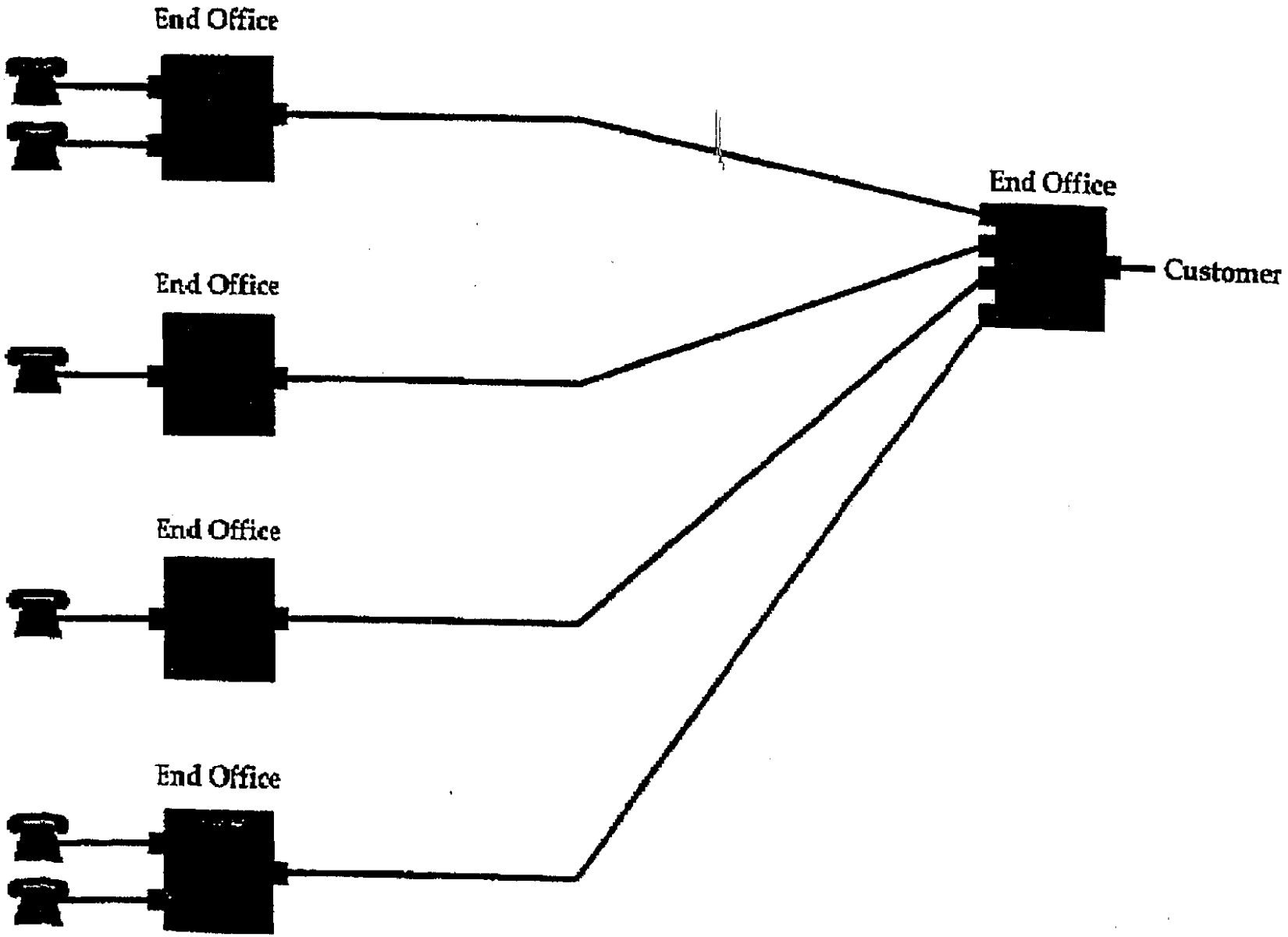
Request:

Please provide a technical description of how ENSEMBLE is provided to customers, including diagrams and descriptions of any ancillary features (e.g., collocation of customer equipment).

Response:

See the Description section of the ENSEMBLE tariff (Ill. C. C. Tariff 19, Part 8, Section 8, Original Sheet 9) which was provided in response to Level 3 data request 65 and the attached diagram.

Ensemble Local Call to ISP Scenario



For DFR - No Transmission Information Available in on line [0] for DFR * Pg 2/2
MAY-26-00 08:53 AM FOXVALLEYICEARENA 6306262138 P.02

Illinois Commerce Commission
Docket 00-0332
Level 3 Data Request 73

Request:

Please explain what is meant in Attachment 2 by the statement that reads "ENSEMBLE is a single Point-of-Presence (POP) solution that allows you to provide your customers with local access within the Ameritech-served areas of a specific LATA."

Response:

ENSEMBLE allows customers to provide local numbers to end user customers in the LATAs of their choice. Callers are forwarded to the ENSEMBLE hub office using Ameritech Illinois' network. The ENSEMBLE customer receives the LATA-wide traffic from the hub via ISDN Prime service.

Illinois Commerce Commission
Docket 00-0332
Level 3 Data Request 74

Request:

Please explain and provide diagrams of the "overlay data network" to which Attachment 2 refers.

Response:

The overlay data network refers to separate trunk groups for ENSEMBLE traffic from ENSEMBLE originating offices to the ENSEMBLE hub office.

AIIS - Who We Are
Business Solutions
Audiotex
CLEC
ILEC
ISP
Products
Service & Support
Publishing Services
Messaging
Monitoring
Payphone (PSP)
Wireless
Products & Services
Industry News
Log on to TCNet

ISP Products

ENSEMBLE[sm]

Single Point-of-Presence (POP) Solution

ENSEMBLE is a single Point-of-Presence (POP) solution that allows you to provide your customers with local access within the Ameritech-served areas of a specific LATA. You can set up dial-up phone numbers for your subscribers within a designated LATA using a single POP. Without the need for multiple POPs, your cost savings will grow.

ENSEMBLE uses advanced intelligent network (AIN) technology to route ISP-bound traffic via a dedicated network optimized for data traffic. Subscriber calls are routed via an overlay data network to a hub switch and then transported to the designated location-all with one local phone call from your customer.

How ENSEMBLE Works

Your customer's Internet calls reach the hub office over separate "data-optimized" trunks from each originating end office in the designated LATA. You will provide your end-users with directory numbers (DNs). When those numbers are dialed, an Ameritech AIN service routes the calls to a hub switch over dedicated trunk groups. At the hub switch, the traffic is carried over dedicated ISDN PRIs, which terminate at a specific location as defined by you. Customers not served out of the hub switch receive access calls via Foreign Exchange (FX) service to their serving Central Office (CO). With this service, you will be able to access dial traffic originating from any central office in that LATA at the hub switch.

FLEXIBLE ARCHITECTURE

As the number of Internet subscribers grows, we can help you grow your business. By expanding and customizing the scope of ENSEMBLE and Ameritech's network architecture, we can accommodate the ever-changing needs and demands you will face. We are dedicated to providing solutions to support your evolving network requirements.

AIIS - Who We Are
Business Solutions
Audiotex
CLEC
ILEC
ISP
Products
Service & Support
Listing Services
Messaging
Monitoring
Payphone (PSP)
Wireless
Products & Services
Industry News
Log on to TCNet

ISP Products

OmniPresence Virtual Point of Presence (POP)

A LATA-wide service which allows you to virtually appear in remote CO's

OmniPresence uses Ameritech's public network to help you expand faster, more flexibly and more cost-efficiently than with your own private network. For an affordable monthly fee, you can establish a remote Point of Presence without investing in costly network equipment, real estate and leased lines back to the hub location. OmniPresence lets you break into new markets and offer your customers a local call.

Click here to go back to Products index.

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TJG SCHEDULE 3

AMERITECH PROPOSED "EEL"
CLEC SELF-CERTIFICATION

Reconfiguring Special Access Arrangements to Unbundled Network Elements (UNEs)

This document is intended to describe the self-certification criteria required in order for Telecommunication Carriers to reconfigure special access arrangements to Unbundled Network Elements (UNE).

I. Background

The FCC's UNE Remand Order, published in the Federal Register on January 18, 2000 as modified by its November 24, 1999 Supplemental Order, in CC Docket No. 96-98 concluded that ILECs could constrain the ability of telecommunications carriers to reconfigure Special Access arrangements to combinations of loop and transport unbundled network elements (UNEs), except under certain circumstances. Specifically, the FCC concluded that telecommunications carriers who are using special access arrangements to provide a significant amount of local exchange, in addition to exchange access service, to a particular customer could be permitted to reconfigure those special access arrangements to a combination of unbundled loop and transport network elements. In elaborating on what constitutes "significant" local exchange service, the FCC cited with approval a September 2, 1999, joint ex parte filing by Bell Atlantic, Intermedia Communications, Allegiance Telecom, and Time Warner Telecom. The FCC also stated that a telecommunications carrier is providing significant local exchange service if the requesting carrier is providing all of an end user's local exchange service.

In addition to authorizing the reconfiguration of special access circuits under the circumstances specified above, the FCC stated that "In situations where the requesting carrier is collocated and has self-provided transport or obtained transport from an alternative provider, but is purchasing unbundled loops, that carrier may provide only exchange access over those facilities."

Finally, the FCC concluded that requesting carriers must self-certify that they are providing a significant amount of local exchange service over special access arrangements in order for those special access arrangements to qualify for reconfiguration to a combination of unbundled loop and transport. For purposes of certification, internet traffic is interstate and not local in nature. A blank copy of the Certification and Options form can be found in the Forms section.

II. Qualification Criteria

A. Loop and Transport Combinations

Carriers may reconfigure a special access arrangement to a combination of unbundled loop and transport network elements when the special access arrangement

- originates at a customer's premise and terminates at the telecommunications carrier's collocation arrangement, and

- has an equivalent UNE NC/NCI code, and
- one of the following options is met at the time of certification:

Option I

- the telecommunications carrier is the exclusive provider of an end user's local exchange service

Option II

- the telecommunications carrier provides local exchange and exchange access service to the end user customer and handles at least one third of the end user customer's local traffic measured as a percent of total end user customer lines and
- at least 50% of the activated channels on the loop portion of the loop and transport combination have at least 5% local voice traffic individually and
- the entire special access arrangement has at least 10% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Option III

- at least 50% of the traffic on at least 50% of the channels on the loop portion of the special access arrangement is local voice traffic and
- the entire special access arrangement has at least 33% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Switched Access and Local Interconnection Trunking

Where special access arrangements are comprised of a combination of special access circuits, switched access direct trunked transport (DDT) or local interconnection trunks, the switched access direct trunk transport (DDT) and local interconnection trunks must be groomed from special access arrangements prior to initiating the reconfiguration process.

B. **Loops Terminating in Collocation Space**

Loops that are terminate in a collocation space may be purchased as UNEs.

C. **Ongoing Qualification**

- A telecommunications carrier that has reconfigured a special access circuit to UNEs will take reasonable measures on an ongoing basis to ensure that all certifications remain valid.
- A telecommunications carrier that has certified in accordance with the above criteria will re-certify its continuing compliance with such criteria every six months. The telecommunications carrier will have met this obligation by sending a letter to its account manager indicating that, based on information provided by the customer, it has re-confirmed that all circuits continue to meet the criteria for reconfiguration to unbundled loop and transport. Carriers may not re-certify compliance without

obtaining information from their customers that will permit them to conclude that those customers' circuits continue to meet the certification criteria.

III Ordering Requirements

SBC will accept requests to reconfigure Special Access arrangements to Unbundled Network Elements (UNEs) using the existing ordering processes for Unbundled Loops and Unbundled Local Transport with the following modifications:

- Telecommunications Carrier (TC)/Competitive Local Exchange Carrier (CLEC) sends to Account Manager a correctly completed Certification Letter and Certification Spreadsheet. See Certification Letter and Certification Spreadsheet in the Forms section.
- All *reconfiguration of Special Access arrangements* to UNEs will be handled as projects. Due dates for all projects are to be negotiated. TC/CLEC must send a Reconfiguration Project Spreadsheet to the Account Manager. This spreadsheet is IN ADDITION not in lieu of the issuance of the following ASR/LSR/EDI orders. See Reconfiguration Project Spreadsheet. A spreadsheet is to contain information limited to one end user location and collocation cage. For reconfigurations including multiplexing, a spreadsheet is to contain all *circuit IDs in the Special Access arrangement* (higher speed and all riding circuits).
- TC/CLEC issues ASR to ICSC to disconnect access circuit

IV Billing

- Termination liability, if applicable, will be billed at the time of disconnect on the Special Access circuit.
- All UNE NRCs in the configuration will apply unless a state commission has ruled otherwise.

To be completed by CLEC/TC								To be completed by SBC			
SBC Existing Facility Name/ Circuit ID	Special Access PON	UNE PON(s)	Date LSR/ ASR's to be sent to SBC	Desired Due Date	Contact Name and Number	CFA (optional)	[redacted]	Special Access Order Number	UNE Order Number(s)	Confirmed Due Date	New SBC Facility Name/ Circuit ID

CERTIFICATION PURSUANT TO FEDERAL COMMUNICATIONS COMMISSION'S *SUPPLEMENTAL ORDER* DATED NOVEMBER 24, 1999 IN CC DOCKET NO. 96-98

_____ ("Carrier") hereby certifies that it is requesting that the following special access circuits be reconfigured as a combination of unbundled loop and transport network elements. Pursuant to the FCC's *Supplemental Order*, in support of its request, Carrier also hereby certifies that the specifically identified circuits provide a significant amount of local exchange service, in addition to exchange access service, to [insert end user customer(s) name and address] via those circuits. By "a significant amount of local exchange service," Carrier certifies that each of the identified circuits meet one of the following certification options:

Option 1

1. The carrier is the exclusive provider of the end user's local exchange service

Option 2

1. Carrier handles at least one third of the identified customer's local traffic; and
2. On the loop portion of the UNE loop-transport service, at least 50 percent of the activated channels have at least 5 percent local voice traffic individually and,
3. For the entire facility, at least 10 percent of the traffic is local voice traffic.
4. If the unbundled loop/transport combination includes multiplexing (e.g. DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Option 3

1. At least 50% of the channels are used to provide local dial tone service and at least 50% of the traffic on each of those local dial tone channels is local voice traffic
2. The entire loop facility has at least 33% local voice traffic and
3. If a loop/transport combination includes multiplexing (e.g. DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Carrier must certify that the requisite information is true for each circuit, and must indicate which Option applies to which circuit. In order to rely on one of the foregoing Options, Carrier must provide the following information for that Option. Carrier may submit the information in the format provided with this Certification, or may submit the information in a different format, as long as it is acceptable to SBC. Carrier's Certification is applicable to all information submitted in support of the Certification. Certifications and/or certification information submitted incorrectly, incompletely or in a form not acceptable to SBC will cause the Certification to be rejected.

For Option 1:

1. Facility Identification Number of each circuit
2. Customer Name and Address for each circuit

For Option 2:

1. Facility Identification Number for each circuit
2. Customer Name and Address for each circuit
   - Total customer lines at the address
   - Total lines provided by Carrier at the address
3. Number of active channels on the loop portion of each circuit
   - State the number of channels carrying at least 5% local voice traffic
4. Certify that at least 10% of each facility carries local voice traffic

For Option 3:

1. Facility Identification Number for each circuit
2. Customer Name and Address for each circuit
3. Number of active channels on the loop portion of each circuit
4. Number of channels providing local dial tone service on the loop portion of each circuit
5. Percentage of traffic on each local dial tone channel that is local voice traffic
6. Certify that at least 33% of the loop facility carries local voice traffic

This certification is made by Carrier through its authorized representative _____, whose title is _____, and who is fully competent to make this Certification, and who has personal knowledge of the facts stated in the Certification and attachments, and attests that they are true and correct.

EXECUTED THIS ____ DAY OF _____, 2000 BY:

_____

[FULL LEGAL NAME OF CARRIER]

_____

_____

Authorized Representative of [Full Legal Name of Carrier]

Certification Accepted/Rejected by [SBC Entity]

Reasons for Rejection:_____

	Option 1		Option 2									
For each circuit ID in Special Access configuration	Is the carrier the exclusive provider of end user's local exchange service?		Does the carrier handle at least 1/3 of the identified customer's local traffic?				On the loop portion of the circuit, state the number of activated channels have at least 5% local voice traffic individually?	For the entire facility, is at least 10% of traffic local voice traffic?		If facility includes multiplexing, do each of the DS1 circuits meet the conditions?		Is at least 50% of portion of
Facility ID / Customer Name and Address	Yes	No	Yes	No	Total customer lines at address	Total lines provided by Carrier at address	Number of Active channels carrying 5% local voice traffic	Yes	No	Yes	No	Yes

Option 3					
Is 50% of traffic on channels on loop primarily local voice traffic?		Does the entire special access arrangement have at least 33% local voice traffic?		If facility includes multiplexing, do each of the DS1 circuits meet the conditions?	
No	Number of Active channels carrying 50% local voice traffic	Yes	No	Yes	No

Denver, Colorado)
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VERIFICATION

I, Timothy Gates, do on oath depose and state that the facts contained in the foregoing Verified Statement are true and correct to the best of my knowledge and belief.

Timothy Gates

Signed and Sworn to
before me this 30th day of
May, 2000.

CHRISTINE LOYATO
My Commission Expires: 2-4-03

CERTIFICATE OF SERVICE

The undersigned attorney for Level 3 Communications, LLC hereby certifies that on May 30, 2000, he/she has caused copies of the attached verified statements to be served on each of the persons listed below via overnight mail:

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Michael R. Romano

Attorney for
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